

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

IN RE:)	
)	CHAPTER 7
Cedar Rock Holdings, LLC,)	
)	C.A. No.: 16-11519-SDB
Debtor.)	
)	
_____)	

**CEDAR ROCK HOLDINGS, LLC’S OBJECTIONS
TO PETITIONERS’ EXHIBIT LISTS AND LACK OF WITNESS LIST**

Cedar Rock Holdings, LLC (“Cedar Rock”) files its objections to Petitioners’ Exhibit List [DE 58] and Amended Exhibit List [DE 60] (the “Exhibit Lists”) and lack of Witness List.

1. Cedar Rock objects to Petitioners’ Exhibit Lists on multiple grounds. Petitioners have refused to provide the documents listed in their Exhibit Lists to Cedar Rock despite request. Under the circumstances, Cedar Rock has no way to know what the documents listed in the Exhibit Lists actually are (beyond the generic description provided), whether they are authentic, whether they are relevant, and whether they are admissible. Given Petitioners’ refusal to provide such documents, Cedar Rock objects to all documents on Petitioners’ Exhibit Lists on all available grounds under the Federal Rules of Evidence, including, but not limited to, lack of relevance (Rule 402), hearsay (Rule 802), and lack of authenticity (Rule 901).

2. Additionally, Petitioners have not filed or served a witness list in this matter. Cedar Rock therefore objects to Petitioners calling any witnesses at the January 25, 2017 hearing on Cedar Rock’s motion to dismiss.

3. Cedar Rock also objects to Petitioners’ Exhibit Lists to the extent such documents are not relevant to the issue of bad faith asserted in Cedar Rock’s motion to dismiss.

Respectfully submitted,

/s/ Christopher A. Cospers
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ATTORNEYS FOR CEDAR ROCK HOLDINGS, LLC

CERTIFICATE OF SERVICE

This is to certify that I have on this day served all the parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”) which was generated as a result of electronic filing.

This 20th day of January, 2017.

/s/ Christopher A. Cospers
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